

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: HYDROGEN PEROXIDE ANTITRUST
LITIGATION**

CIVIL ACTION NO. 05-666

This Document Relates To:

CLASS ACTION

DIRECT PURCHASER ACTIONS

**DIRECT PURCHASER PLAINTIFFS' RESPONSE TO MOTION
OF 3969410 CANADA INC. c.o.b. PARK AVENUE HAIR SALON
AND DISTRIBUTECH INC. TO INTERVENE FOR THE LIMITED
PURPOSE OF SEEKING MODIFICATION TO PROTECTIVE ORDER**

The Direct Purchaser Plaintiffs, by their undersigned counsel, hereby respond to the motion of 3969410 Canada Inc. c.o.b. Park Avenue Hair Salon And Distributech Inc. To Intervene For The Limited Purpose Of Seeking Modification To Protective Order.

RESPONSE

The Direct Purchaser Plaintiffs do not oppose the Canadian plaintiffs' motion to intervene for the limited purpose of seeking modification of the Protective Order, as such relief appears to be consistent with prevailing authority, including Judge Dubois's decision (citing other authorities) in *In re Linerboard Antitrust Litig.*, 333 F.Supp. 333 (E.D.Pa. 2004).

If the Court were to grant the Canadian plaintiffs' motion in whole or in part, the Direct Purchaser Plaintiffs will, of course, cooperate fully with all interested counsel for the Canadian plaintiffs and for defendants, to ensure that any proceedings that may occur pursuant to and as a result of any ruling on the Canadian plaintiffs' motion take place in an orderly and efficient fashion.

Dated: July 11, 2006

Respectfully submitted,

BOLOGNESE & ASSOCIATES, LLC

By: 

Anthony J. Bolognese (AJB935)

Joshua H. Grabar (JHG1707)

One Penn Center

1617 JFK Blvd., Suite 650

Philadelphia, PA 19103

Telephone: (215) 814-6750

Facsimile: (215) 814-6764

Michael D. Hausfeld

William Butterfield

Reena Gambhir

COHEN MILSTEIN HAUSFELD

& TOLL, PLLC

1100 New York Avenue, N.W.

West Tower, Suite 500

Washington, DC 20005

Telephone: (202) 408-4600

Facsimile: (202) 408-4699

Robert N. Kaplan

Gregory Arenson

Jason Zweig

KAPLAN FOX & KILSHEIMER LLP

805 Third Avenue, 22nd Floor

New York, NY 10022

(212) 687-1980

(212) 687-7114 (fax)

Steven A. Kanner

William H. London

Douglas A. Millen

MUCH SHELIST FREED DENENBERG

AMENT & RUBENSTEIN, P.C.

191 North Wacker Drive, Suite 1800

Chicago, IL 60606

Telephone: (312) 521-2000

Facsimile: (312) 521-2100

**Co-Lead Counsel for the Direct
Purchaser Plaintiffs**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: HYDROGEN PEROXIDE ANTITRUST
LITIGATION**

CIVIL ACTION NO. 05-666

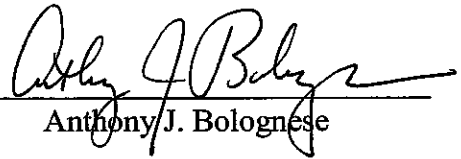
This Document Relates To:

CLASS ACTION

DIRECT PURCHASER ACTIONS

CERTIFICATE OF SERVICE

I, Anthony J. Bolognese, one of the attorneys for plaintiffs, hereby certify that on the 11th day of July, 2006, a copy of the accompanying document request was served electronically upon all defendants' counsel of record, as identified on the accompanying service list.


Anthony J. Bolognese

***Counsel for 3969410 Canada Inc. c.o.b.
Park Avenue Hair Salon And Distributech Inc.***

Timothy N. Matthews
Chimicles & Tikellis, LLP
361 West Lancaster Avenue
Haverford, PA 19041
Telephone: (610) 642-8500
Facsimile: (610) 649-3633

Jonathan W. Cuneo
David W. Stanley
Cuneo Gilbert & LaDuca, LLP
507 C Street, NE
Washington, DC 20002
Telephone: (202) 789-3960
Facsimile: (202) 789-1813

List of Defendants' Counsel/Eastern District of Pennsylvania

Nancy J. Gellman
Conrad O'Brien Gellman & Rohn, P.C.
1515 Market Street, 16th Floor
Philadelphia, PA 19102
Telephone: (215) 864-8065
Facsimile: (215) 864-9620

Daniel G. Swanson
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: (213) 229-7000
Facsimile: (213) 229-6430

Stephen C. McKenna
Monica Loseman
Gibson, Dunn & Crutcher LLP
1801 California St., Suite 4200
Denver, CO 80202-2641
Telephone: (303) 298-5700
Facsimile: (303) 296-5310

***Counsel for Defendants Akzo Nobel Chemicals International B.V. and Akzo Nobel,
Inc. and EKA Chemicals, Inc.***

Howard D. Scher
Steven E. Bizar
Eliot G. Long
Buchanan Ingersoll PC
1835 Market Street, 14th Floor
Philadelphia, PA 19103
Telephone: (215) 772-8700
Facsimile: (215) 772-8760

Counsel for Defendant Arkema Inc., Atofina Chemicals, Inc.

Richard G. Parker
Michael E. Antalics
Karin F.R. Moore
Hima Vatti
Laura M. Kam
O'Melveny & Myers LLP
1625 Eye Street, NW
Washington, DC 20006-4001
Telephone: (202) 383-5300
Facsimile: (202) 383-5414

Counsel for Defendant Degussa Corporation

Joseph A. Tate
Christine C. Levin
George G. Gordon
Dechert LLP
4000 Bell Atlantic Tower
1717 Arch Street
Philadelphia, PA 19103-2793
Telephone: (215) 994-4000
Facsimile: (215) 994-2222

Counsel for Defendant FMC Corporation

Jeffrey S. Cashdan
Stephen P. Cummings
King & Spalding LLP
191 Peachtree Street
Atlanta, GA 30303-1763
Telephone: (404) 572-4600
Facsimile: (404) 572-5141

Barbara W. Mather
Pepper Hamilton LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
Telephone: (215) 981-4000
Facsimile: (215) 981-4750

Counsel for Defendant Kemira Chemicals, Inc.

Steven W. Thomas
Adam S. Paris
Amanda C. Denaro
Sullivan & Cromwell
1888 Century Park East
Los Angeles, CA 90067-1725
Telephone: (310) 712-6600
Facsimile: (310) 712-8800

Alan J. Davis
Burt M. Rubin
Ballard Spahr Andrews & Ingersoll, LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
Telephone: (215) 665-8500
Facsimile: (215) 864-8999

Counsel for Defendants Solvay America, Inc., Solvay Chemicals, Inc. and Solvay Interlox, Inc.